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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, DENIS
MOLINA, JHONY SILVA, MARIA ELENA
HERNANDEZ, O.C., SANDHYA LAMA, S.K.,
and TEOFILO MARTINEZ,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, UNITED
STATES DEPARTMENT OF HOMELAND
SECURITY, and UNITED STATES OF
AMERICA,

Defendants.

Case No. 25-cv-05687-TLT

**DECLARATION OF JESSICA KARP
BANSAL IN SUPPORT OF PLAINTIFFS'
MOTION FOR PARTIAL SUMMARY
JUDGMENT**

Date: TBD

Time: TBD

Place: TBD

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1 I, Jessica Karp Bansal, hereby declare:

2 1. I am an attorney at law duly licensed and entitled to practice in the State of
3 California. I am an attorney with the National Day Laborer Organizing Network and counsel of
4 record in this action. I make this declaration in support of Plaintiffs' Motion for Partial Summary
5 Judgment. I have personal knowledge of the following facts and, if called as a witness, I could and
6 would testify competently as follows.

7 2. Attached as Exhibit A is a chart listing all the terminations of TPS designations over
8 the 35-year history of the TPS program. The chart is in chronological order by date of termination
9 notice. As the chart shows, in the two decades prior to the current administration, DHS has always
10 provided at least a six-month orderly transition period when terminating a TPS designation of any
11 length.

12 I declare under penalty of perjury under the laws of the United States of America that the
13 foregoing is true and correct.

14 Executed this 25th day of August, 2025, in Claremont, California.

15 /s/ Jessica Karp Bansal

16 Jessica Karp Bansal

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